

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE

IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION

Hon. Robert Kugler  
Magistrate Karen Williams  
Special Master Thomas Vanaskie

Civil No. 1:19-md-2875-RBK-JS

This Document Relates to:

*All Actions*

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**DECLARATION OF MARLENE J. GOLDBERG**

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I, Marlene J. Goldenberg, of full age, hereby declare as follows:

1. I am an attorney of the State of Minnesota, a member of good standing of the bar of this Court, and am employed with the law firm GoldenbergLaw, PLLC, counsel to Plaintiffs.
2. I make this Declaration on behalf of Plaintiffs in support of their Motion to Strike and Suppress All of Aurobindo's Defenses.
3. Attached hereto as Exhibit A is a true and correct copy of the August 14, 2019 hearing transcript.
4. Attached hereto as Exhibit B is a true and correct copy of the February 13, 2020 hearing transcript.
5. Attached hereto as Exhibit C is a true and correct copy of the June 17, 2020 hearing transcript.
6. Attached hereto as Exhibit D is a true and correct copy of the December 9, 2020 hearing transcript.

7. Attached hereto as Exhibit E is a true and correct copy of the February 17, 2021 hearing transcript.
8. Attached hereto as Exhibit F is a true and correct copy of the February 24, 2021 hearing transcript.
9. Attached hereto as Exhibit G is a true and correct copy of the March 12, 2021 hearing transcript.
10. Attached hereto as Exhibit H is a true and correct copy of the March 24, 2021 hearing transcript.
11. Attached hereto as Exhibit I is a true and correct copy of the March 31, 2021 hearing transcript.
12. Attached hereto as Exhibit J is a true and correct copy of the April 14, 2021 hearing transcript.
13. Attached hereto as Exhibit K is a true and correct copy of the Bhadresh Doshi deposition transcript.
14. Attached hereto as Exhibit L is a true and correct copy of the Prasad Gorijavolu deposition transcript.
15. Attached hereto as Exhibit M is a true and correct copy of the Blessy Johns Deposition transcript.
16. Attached hereto as Exhibit N is a true and correct copy of the Jasleen Gupta deposition transcript.
17. Attached hereto as Exhibit O is a true and correct copy of the Certificate of Compliance served on Plaintiffs regarding Aurobindo's production of its standard operating procedures.
18. Attached hereto as Exhibit P is a true and correct copy of Aurobindo's production index as of April 21, 2021.

19. Attached hereto as Exhibit Q is a true and correct copy of a letter sent by Plaintiffs' counsel to all API and Finished Dose Defendants regarding ESI.
20. Attached hereto as Exhibit R is a true and correct copy of a letter sent by Plaintiffs' counsel to all API and Finished Dose Defendants regarding priority custodians and documents.
21. Attached hereto as Exhibit S is a true and correct copy of a letter from Aurobindo to Plaintiffs on February 26, 2021 detailing the number of hits that were generated for each US custodian.
22. Attached hereto as Exhibit T is a true and correct copy of Aurobindo Exhibit 5, which is a compilation of relevant metadata fields for all documents produced in Bhadresh Doshi's custodial file as of the night before his deposition. Highlighted fields were added by Plaintiffs' counsel and used in the deposition to show the source of each document.
23. Attached hereto as Exhibit U is a true and correct copy of Aurobindo Exhibit 34, which is a compilation of relevant metadata fields for all documents produced in Prasad Gorijavolu's custodial file as of the night before his deposition. Highlighted fields were added by Plaintiffs' counsel and used in the deposition to show the source of each document.
24. Attached hereto as Exhibit V is a true and correct copy of the November 20, 2019 hearing transcript.
25. Attached hereto as Exhibit W is a true and correct copy of a letter sent from Aurobindo to Plaintiffs regarding Aurobindo's electronic sources of data on November 13, 2019.
26. Attached hereto as Exhibit X is a true and correct copy of the publicly available LinkedIn profile for Krishna Reddy Chada, which was last accessed on April 22, 2021.
27. Attached hereto as Exhibit Y is a true and correct copy of a March 29, 2021 letter from Aurobindo to Plaintiffs regarding who at the company received litigation holds and when.
28. Attached hereto as Exhibit Z is a true and correct copy of the publicly available LinkedIn profile for Arpit Patel, which was last accessed on April 22, 2021.

29. Attached hereto as Exhibit AA is a true and correct copy of Aurobindo Exhibit 15, a printout of the FDA's website on sartan recalls.

I, Marlene J. Goldenberg, declare under penalty of perjury that the foregoing is true and correct.

Executed on April 23, 2021.

/s/ Marlene J. Goldenberg  
Marlene J. Goldenberg